

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

JILL BALLARD, REBECCA VARNO,
and MARK POKORNI on behalf of
themselves and the class members
described herein,

Plaintiffs,

v.

NAVIENT CORPORATION,
NAVIENT SOLUTIONS, INC., AND
NAVIENT SOLUTIONS, LLC,

Defendants.

Civil Action

No. 3:18-cv-00121-MEM-DFB

**DEFENDANT’S REVISED UNOPPOSED MOTION TO ENLARGE
DEFENDANTS’ TIME TO RESPOND TO PLAINTIFFS’
MOTION TO AMEND THE SECOND AMENDED COMPLAINT**

Defendants Navient Corporation (“Navient Corp.”) and Navient Solutions, LLC, formerly known as Navient Solutions, Inc. (“NSL”), respectfully move this Court for an Order enlarging the time to respond to Plaintiffs’ Motion to Amend the Second Amended Complaint. In support of their position, Defendants state as follows:

1. On March 11, 2024, during a status conference with the parties, Judge Bloom set a schedule for the parties to file and respond to Plaintiffs’ Motion to Amend the Second Amended Complaint (the “Motion”).

2. On April 18, 2024, Defendants contacted Plaintiffs seeking to reach a joint agreement regarding the proposed Complaint amendments and ongoing discovery in this matter.

3. Both Defendants and Plaintiffs counsel discussed this potential agreement on April 19, 2024.

4. While a final resolution regarding the proposed Amendments was not reached, Defendants are optimistic that the parties can come to a mutual resolution.

5. In light of the ongoing discussions between Defendants and Plaintiffs, Defendants respectfully request that the time to respond to Plaintiffs' Motion be enlarged by ten (10) days.

6. In other words, Defendants request that the deadline to respond to Plaintiffs' Motion be enlarged to Thursday, May 2, 2024.

7. Defendants also respectfully request that Plaintiffs time to file a reply, if necessary, be enlarged by the same amount of time, ten (10) days, to May 16, 2024.

8. Plaintiffs agreed to the enlargement of these deadlines in the parties' conference on April 19, 2024.

WHEREFORE, Defendants respectfully request that the Court enlarge the time to respond to Plaintiffs' Motion to Amend the Second Amended Complaint to May 2, 2024 and enlarge the time for Plaintiffs to file a reply to May 16, 2024.

Respectfully submitted,

NAVIENT SOLUTIONS, LLC AND
NAVIENT CORPORATION

Dated: April 22, 2024

BY: /s/ Andrew J. Soven
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[PROPOSED] ORDER

AND NOW, this _____ day of _____ 2024, following Defendant's
Unopposed Motion to Enlarge Time to Respond to Plaintiffs' Motion to Amend
the Second Amended Complaint, IT IS HEREBY ORDERED THAT:

1. Defendants shall file their Response in Opposition to the Motion to
Amend the Second Amended Complaint or a Joint Agreement Between the Parties
no later than May 2, 2024.

2. If a Reply is necessary, Plaintiffs shall have until May 16, 2024 to file
any such Reply.

The Honorable Darryl F. Bloom

CERTIFICATE OF SERVICE

I, Andrew J. Soven, hereby certify that, on April 22, 2024, I caused the foregoing document to be filed electronically with this Court, where it is available for viewing and downloading from the Court's ECF system, which will serve a copy on all counsel of record.

By: /s/ Andrew J. Soven
Andrew J. Soven